

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.)	
THOMAS J. MILLER,)	
ATTORNEY GENERAL OF IOWA,)	
)	Equity No. EQCE 077657
Plaintiff,)	
)	
v.)	
)	
RECORD TRANSFER SERVICES, LLC,)	
a California limited liability corporation; and))	CONSENT JUDGMENT
)	
NEIL CAMENKER,)	
)	
Defendants.)	

The Court, having been presented by Assistant Attorney General Steve St. Clair with this Consent Judgment and having reviewed the file in this matter, determines that final judgment should be entered herein, and finds as follows:

1. Plaintiff State of Iowa ex rel. Thomas J. Miller, Iowa Attorney General, has filed a Petition in Equity against the above-captioned defendants (“Defendants”) pursuant to Iowa Code § 714.16 (2013), the Iowa Consumer Fraud Act (“CFA”), and this Consent Judgment, which has been approved by Plaintiff and both Defendants, is intended to resolve this litigation.
2. The Court has jurisdiction of the parties and subject matter.
3. The Court finds that this Consent Judgment should be entered.
4. This Consent Judgment constitutes a full and final resolution of any and all claims by the Iowa Attorney General against Defendants for alleged violations of the CFA that occurred prior to the effective date of this Consent Judgment in connection with the acts and practices

addressed in the Petition in this cause.

IT IS THEREFORE ORDERED that Defendants, whether through principals, employees, agents, servants, representatives, subsidiaries, affiliates, successors, assigns, or any other persons, shall refrain from engaging, directly or indirectly, in acts or practices that violate the Iowa Consumer Fraud Act, Iowa Code § 714.16, and from engaging or participating, directly or indirectly, in any form of solicitation or marketing that (a) is directed to residents of Iowa, or is conducted in whole or in part from an Iowa location, and (b) involves an offer to obtain or furnish deeds or other records or information that is available from governmental sources (herein, “record-related services”).

IT IS FURTHER ORDERED that, upon the request for a refund by any Iowa resident who paid one or both Defendants for record-related services that were solicited or provided between March 14, 2011 and the entry of this Consent Judgment, Defendants shall promptly make a full refund.

IT IS FURTHER ORDERED that, in addition to whatever other legal remedies may be available, a violation of this Consent Judgment constitutes a violation of the Iowa Consumer Fraud Act, Iowa Code § 714.16 (2013), and each violation by a defendant of this Consent Judgment, if established by a preponderance of the evidence in a Consumer Fraud Act action by the Attorney General, gives rise to a civil penalty in an amount to be determined by the court.

IT IS FURTHER ORDERED that, pursuant to Iowa Code § 714.16, Defendants pay to the Attorney General, within five (5) days of entry of this Consent Judgment, \$25,000.00, in the manner instructed by the Attorney General, such sum to be deposited in the consumer fraud enforcement fund referred to in Iowa Code § 714.16C, excepting such portion thereof as is

required to pay the court costs herein.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction for purposes of enforcement of this Consent Judgment, and that Defendants shall pay court costs of this action as provided in the preceding paragraph.

SO ORDERED.

Approved:

Date: 3-2-15

/s/ Neil Camenker

For Record Transfer Services, LLC

Date: 3-2-15

/s/ Neil Camenker

Date: March 3, 2015

/s/ Steve St. Clair

Assistant Iowa Attorney General



State of Iowa Courts

Type: ORDER FOR CONSENT DECREE

Case Number **Case Title**
EQCE077657 STATE OF IOWA EX REL. MILLER V. RECORD TRANSFER SE

So Ordered

A handwritten signature in black ink that reads 'Karen A. Romano'. The signature is written in a cursive, flowing style.

Karen A. Romano, District Court Judge,
Fifth Judicial District of Iowa